## Social History:

She is a "very light" smoker (1-5 cigg./day). She denied any alcohol or significant drug history.

She reported that she is now living with her parents in Missouri, and that she feels much better there. In this current home there are no known environmental problems.

### Physical Examination:

Blood pressure: 100/60 mmHg. Respiratory rate 12/min. Temperature 98 T. Height: 5'5". Weight: 138 pounds. Her peak flow was 550 ml.

Examination of head, ears, nose, throat, chest, abdomen, lungs, and extremities was overall unremarkable.

### Laboratory Tests:

No reaction to specific IgE and IgG fungal allergens. There was a very minimal IgA elevation to Stachybotrys specific IgA.

Pulmonary function test and Chest x-ray were not done.

Immunological test which included IgG subclasses and lymphocyte enumeration test and function test showed a higher than normal T and B-lymphocyte cell counts/percentage. The remainder of the testing was normal. These findings are non-specific, but typical after intense fungal exposure and some immune reactivity. Follow up repeat evaluation have been recommended.

I reviewed medical records provided to me by various providers. These records did not produce any additional information.

The environmental investigation and report by Mr. R. Pfromm indicated the presence of moisture related fungi and defects inside the house, in particular in the basement. Fungi included species of Aspergillus, Penicillium and Stachybotrys, that were higher inside the house than outside (control). Photos were also provided confirming visible contamination.

#### Conclusion:

Based on recent findings, I conclude that Ms. Vida Marrone had also a typical acute respiratory reaction after intense exposure to mold and mildew in her previous home. She has been diagnosed with upper and lower acute airway inflammation and irritation effects (Rhinosinusitis, bronchitis). With a reasonable degree of medical certainty I believe these were the results of the exposure in the described contaminated house. She has been advised that in the future she should avoid any of these moldy indoor exposures and stop

smoking. Provided that she has no further exposure to the fungi, she should be reasonably well related to this condition.

Sincerely,

Eckardt Johanning, M.D. MSc.

Diplomate of American Board of Preventive Medicine

(Occupational and Environmental Medicine)

Diplomate of American Board of Family Medicine

# CERTIFICATE OF SERVICE

AND NOW, this 16<sup>th</sup> day of May, 2003, I hereby certify that I, Denise L. Huber, an employee of Duane Morris, LLP served a copy of the Appendix in Support of Defendant's HouseMaster's Renewed Motion for Summary Judgment on the following by depositing a true and correct copy of the same in the U.S. Mail at Harrisburg, Pennsylvania, postage prepaid, addressed to:

James G. Nealon, III, Esquire Nealon & Gover, P.C. 2411 North Front Street Harrisburg, PA 17110

John Flounlacker, Esquire Thomas, Thomas & Hafer, LLP 305 North Front Street Harrisburg, PA 17108

Edward A. Monsky, Esquire Fine, Wyatt & Carey, P.C. 425 Spruce Street Scranton, PA 18501-0590

Gianni Floro, Esquire Tarasi, Tarasi & Fishman, P.C. 510 Third Avenue Pittsburgh, PA 15219

Joel D. Gusky, Esquire Harvey, Pennington, Cabot, Griffith & Renneisen, Ltd. Eleven Penn Center 1835 Market Street, 29<sup>th</sup> Floor

Philadelphia, PA 19103

By:

Denise L. Huber